

TERRY L. KEEHN

Name

715925

Prison Number

ANCHORAGE CORRECTIONAL COMPLEX

Place of confinement

1300 E 4th Ave

Mailing address

Anchorage AK 99501

City, State, Zip

907-268-9469 (message only)

Telephone

RECEIVED  
OCT 17 2017  
CLERK, U.S. DISTRICT COURT  
ANCHORAGE, AK.

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

TERRY LEE KEEHN II & CASEY LEIGH KEEHN

(Enter full name of plaintiff in this action)

Case No.

3:17-cv-00220 RRB

(To be supplied by Court)

Plaintiff,

vs.

A.S.T MIKE INGRAM

A.S.T DAVE DECOVER

A.S.T DAVID HANSON

A.S.T HANS BRINKE

ASSISTANT ALASKA STATE ATTORNEY

ALEX ALEXANDER

(Enter full names of defendant(s) in this action.

Do NOT use *et al.*)

Defendant(s).

PRISONER'S  
COMPLAINT UNDER  
THE CIVIL RIGHTS ACT  
42 U.S.C. § 1983

A. Jurisdiction

Jurisdiction is invoked under 28 U.S.C. § 1343(a)(3).

B. Parties

1. Plaintiff: This complaint alleges that the civil rights of TERRY & CASEY KEEHN  
(print your name)

who presently resides at 1300 E 4th Ave Anchorage AK 99501  
(mailing address or place of confinement)

were violated by the actions of the individual(s) named below.

2. Defendants (Make a copy of this page and provide same information if you are naming more than 3 defendants):

Defendant No. 1, MIKE INGRAM is a citizen of  
(name)  
ALASKA, and is employed as an ALASKA STATE TROOPER.  
(state) (defendant's government position/title)

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

Defendant No. 2, David DeCoyer is a citizen of  
(name)  
Alaska, and is employed as an ALASKA STATE TROOPER.  
(state) (defendant's government position/title)

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

Defendant No. 3, David Hanson is a citizen of  
(name)  
Alaska, and is employed as an ALASKA STATE TROOPER.  
(state) (defendant's government position/title)

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

**\*\*\*REMINDER\*\*\***

**You must exhaust your administrative remedies before your claim can go forward.  
THE COURT MAY DISMISS ANY UNEXHAUSTED CLAIMS.**

**C. Causes of Action** (You may attach additional pages alleging other causes of action and facts supporting them if necessary. Make copies of page 5 and rename them pages 5A, 5B, etc. and rename the claims, "Claim 4," "Claim 5, etc.").

2. **Defendants** (Make a copy of this page and provide same information if you are naming more than 3 defendants):

Defendant No. 4, HANS Brinke is a citizen of Alaska, and is employed as an Alaska State Trooper.  
(state) (name) (defendant's government position/title)

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

Defendant No. 5, Alexander Alexander is a citizen of Alaska, and is employed as an Assistant State Attorney.  
(state) (name) (defendant's government position/title)  
Special Prosecutions

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

Defendant No. 3, \_\_\_\_\_ is a citizen of \_\_\_\_\_, and is employed as a \_\_\_\_\_.  
(state) (name) (defendant's government position/title)

☐ This defendant **personally participated** in causing my injury, and I want **money damages**.

OR

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone do something).

**\*\*\*REMINDER\*\*\***

**You must exhaust your administrative remedies before your claim can go forward.  
THE COURT MAY DISMISS ANY UNEXHAUSTED CLAIMS.**

**C. Causes of Action** (You may attach additional pages alleging other causes of action and facts supporting them if necessary. Make copies of page 5 and rename them pages 5A, 5B, etc. and rename the claims, "Claim 4," "Claim 5, etc.").

Claim 1: On or about 13<sup>th</sup> January 2016, my Constitutional ~~civil~~ right to

be free from Search & Seizure <sup>(Date)</sup> without probable cause

(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List **only one** violation.)

was violated by AST MIKE INGRAM

(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 1. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 1.):

### BACK GROUND

ON DEC 1, 2015 Sara Johnston was in a fatal car wreck. Sara was a close friend. Immediately Scott Hagy called and asked for Saras property. We knew that Sara was harrassed by Scott years prior and she had nothing to do with him. Scott began Harrassing and following us, sitting outside our house, then on Dec 28, Terry Keehn gets a phone call from AST MIKE Ingram, telling us to return Saras belongings to Scott Hagy. Terry said get a warrant and disconnected. This started in motion many violations of the (Keehns) constitutional rights.

First Mr KEETHN was listed at Saras Place of Employment as Her Emergency contact and Next of Kin. After the Providence Hospital called Her Employer and recieved that Information, it was passed to the Alaska State Troopers, where a Seargent called Mr Keehn because Sara wrote Him as Her "Father" on Emergency contact. Mr Keehn met trooper at Walgreens in Wasilla to recieve the news of her tragedy. Then went Right home two blocks away. Followed by the Troopers.

### FACTUAL BASIS

IN INGRAMS AFFIDAVIT HE USED Judicial Deception ~~to~~ when applying for warrant.

1) THE Confidential Informant.

- 1) THE complaint from the C.I. was on Oct 10<sup>th</sup> but states that an Aspin check of the phone number it originated from was registered to the Plaintiff on Oct 24<sup>th</sup>. One day after his birthday since it was a birthday gift. The C.I. also only referred to her friend giving massages and having missed appointments, nothing about prostitution or sex trafficking was relayed but in Affiant's statement the words prostitution were added.
- 2) Then in Scott Hagy's statement he states "I know Sara was up to something I just didn't know what." But when affiant quotes him for the Affidavit, Ingram stated that Hagy told Ingram that Sara and Ashley Hunter mentioned they were prostitutes that worked for the Plaintiff. (Judicial Deception)
- 3) Further Scott Hagy hadn't had contact with Sara for many years, this was verifiable with Sara's phone, face book, and by friends or her boyfriend of 4 years Eric Hunter.  
Scott Hagy is Emily Johnston's Ex-Stepfather of 10 years ago, Emily's mother was not Sara's mother so there is no relation between Hagy and Johnston so this put in the affidavit was deceptive to make Hagy's statements more than simple hearsay. In fact Hagy said on Facebook that "He told Ingram he was only Emily's stepfather," and Ingram said to Hagy "Same difference". (Judicial Deception)  
This information was in Sara's phone with pictures that were taken by Sara and uploaded to Backpage of Sara and other girls. Ingram had to get rid of phone as evidence that could be exculpatory. Ingram and Hagy disposed of Sara's phone. Ingram never cooperated anything Hagy told him because the Affidavit would fail.

- 4) Ingram called Plaintiffs on Dec 28 2015 and demanded Keehns to give Sara Johnstons belongings to Scott Hagy; Plaintiff stated "It is a civil case, Am I under arrest?" Ingram replied "No", And Keeh said 'get a warrant or proceed to civil court, Im done being Harrassed by Scott Hagy.  
Ingram omitted this phone conversation in Affidavit. Affiant told court later that this conversation never happened. (Judicial Deception).
- 5) Ingram never mentioned in Affidavit that the apartment he asked to search was only rented 5 days prior to warrant and not one person stayed at the apartment Plaintiffs were in Kernal for 5 days after apartment was paid for. There is no nexus connecting that place requested to search with any illegal activity or any evidence that anything would be found or suspected at residence to be searched. (Judicial deception)
- 6) Ingram stated in Affidavit that he wanted cell phones that may be used to post to sites like " backpage", but left out that neither of the Plaintiffs phone numbers were ever used or posted on " backpage" or any escort website.
- 7) THE Allegations came from a rented property in wasilla 3 months before the search warrant. The U.S. Marshalls rented a Condo next to the ~~defendant~~ Plaintiffs for 3 months and concluded there was no Sex trafficking Venture and no probable cause to get a search warrant.
- 8) Ingram stated in Affidavit that Plaintiff had arrests in past for sex crimes and weapon charges which is false information.

It is clearly established that Judicial Deception may not be employed to obtain a search warrant, and renders said warrant illegal, violating my Fourth and Fourteenth Amedment to the Constitution for which I seek relief.



Claim <sup>2</sup>: On or about 13<sup>th</sup> day January 2016, my civil right to  
(Date)  
Fourth AMENDMENT TO Constitution of United States  
(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom  
from cruel and unusual punishment, etc. List only one violation.)  
was violated by ALASKA STATE TROOPER MIKE INGRAM  
(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 1. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 1.):

A.S.T MIKE Ingram Served Search warrant 3AN-16-111SW  
after arresting My wife Casey Keen and Myself,  
reading us our rights and holding us for 3.5  
hours in rear of Police car while warrant was served.  
We asked for copies or to see the warrant and was refused.  
MIKE Ingram used the warrant as a pretext for a  
general Search of Property not listed on the warrant,  
and that had nothing to do with evidence of a crime.  
Ingram went outside the boundaries of the warrant  
on his own to box up personal effects, a jewelry box,  
cash, family photos, Court papers, personal paperwork  
a personal laptop and two cameras and after other  
officers left residence, Ingram filled out the warrant  
receipt alone and listed this box under Inventory  
as "safe keeping", but did not include individual items  
inside the box on the Inventory receipt. Ingram  
did not log this box of personal effects into evidence,  
or as evidence. He simply kept the property and met up  
with Scott Hagy the next day to hand off the  
property to be disposed of and never recovered.  
This denied Terry and Casey Keen of their property  
which is also in violation of 18 USCS 2294,  
Casey Keen did not give permission for any property  
to be removed that was not approved in warrant.

Claim <sup>3</sup> 2: On or about 28 January 2016, my <sup>Constitutional</sup> ~~civil~~ right to  
4th amendment right freedom from unnecessary search  
(Medical care, access to the courts, due process, freedom of religion, free speech, freedom of association, freedom from cruel and unusual punishment, etc. List **only one** violation.)

was violated by AST MIKE INGRAM, AST Dave DeCoeur  
(Name of the specific Defendant who violated this right)

Supporting Facts (Briefly describe facts you consider important to Claim 2. State what happened briefly and clearly, in your own words. Do not cite legal authority or argument. Describe exactly what each defendant, by name, did to violate the right alleged in Claim 2.):

ON 28 January Ingram and DeCoeur returned to the residence of Plaintiffs with Search warrant 3AN-16-249 SW for Firearms of .40 and .45 caliber.

On approach Casey Keehn was outside walking the dog and smoking. Ingram waited and followed her back inside, never patted her down "for safety" or asked if she had any firearms. Casey Keehn is a Veteran and is not a felon. She can own firearms. This warrant was only to Harass The Keehns further.

MIKE INGRAM decides to have the two females that are present strip searched. No one is under arrest noone was giving the reasonable suspicion that after a very aggressive pat down, that they had large firearms concealed. The strip search in our home was only to degrade further. The Supreme court holds that nobody outside of a Jail facility or not under arrest for Felony charges should ever be subject to strip search. INGRAM ALSO Dumped out Food containers and Condiments like Ketchup and mustard. This was to ruin food and further Harass Plaintiffs.



Casey exercised her Miranda right on Audio in patrol car as Ingram questioned her on recorded Audio and never asked if he could remove anything not listed on the warrant.

Ingram can be heard on Audio when questioning both plaintiffs separately. He immediately asks "where Sara Johnstons belongings are?" This proves he used the warrant as a pretext to look for items Scott Hagy requested Ingram to find.

7 days after warrant was served Ingram takes a statement from Ashley Hunter. The first question Ingram asks Ashley is "where is Sara Johnstons belongings?" Ashley states "Her things are in my Grandfathers shed". All on Audio record. This proves the box taken from the plaintiffs could not have been what Ingram and Hagy were looking for, and it proves that Ashley Hunter never talked to Ingram or Hagy prior to her statement. (Judicial deception)

According to Ingrams supplemental Police reports he met up with Scott Hagy the following day (Jan 14 2016) and gave Hagy a box of items that were stolen by Ingram from Plaintiffs. Manipulating evidence destroying items that would have helped in Plaintiffs defense and denying Plaintiffs of irreplaceable property depriving Plaintiffs of Fourth and Fourteenth Amendment of their Constitutional rights.

**We are** seeking relief from loss of liberty, property, privacy Both persons sense of security, Individual dignity  
loss of wages incurred by false incarceration,  
Emotional distress and Furtherance of Plaintiff Casey Keeln  
Post traumatic stress disorder.

The Constitution guarantees the right to not be searched in one's own home without probable cause and the Supreme Court of the United States reiterates many times through Statutes and Case law that no person shall be submitted to a strip search unless it's a felony arrest and performed at a Jail Facility.

Plaintiffs seek relief for loss of security, loss of privacy, individual dignity and appropriate emotional distress all caused by Defendants violating Fourth Amendment Rights.

The Defendants conspired to deprive Plaintiffs of their Constitutional rights as provided above and committed overt acts in furtherance of said deprivation.

claim~~ed~~ on or about 13 January 2016 my constitutional and civil rights were violated, My right to be free from illegal search and seizure and right to due process. Fourth and Fourteenth Amendment of U.S. Constitution.  
Caused by David Hanson (LT for AST) Hans Brinke (Col. for AST)  
Supporting Facts

LT. DAVID HANSON and Col. HANS BRINKE are responsible to train and supervise Alaska State Troopers and assure public to be free from violation of Constitutional rights by Troopers.

Both LT. David Hanson and Col. Hans Brinke are responsible for reprimanding and discharging any Troopers that violated the policies, customs or patterns of investigations ~~done~~ and techniques, provided in said training by Alaska State Troopers.

- 1) Both Individually and in concert deprived Plaintiffs of property, liberty without due process of Law.
  - 2) Defendants deprived them of their First and Fourteenth Amendment (right to access court) by the disposing and destruction of exculpatory evidence and not making it available to the prosecutor and defense attorney.
  - 3) The A.S.T's policies, customs or patterns and practice of investigative misconduct was also reflected in response from LT. DAVID HANSON to Plaintiffs, Admitting the violations but stating (unfounded). This has been included in the file as evidence for fear of retaliation and it disappearing.
- This type of misconduct is evident in prior cases investigated by A.S.T. in past, which upon information and belief were known to these two defendants and other supervisors and policy makers of A.S.T. prior to the Keehn investigation. The misconduct committed in those cases by A.S.T officers

Including Ingram who is lead investigator in Keehns case by A.S.T, was actually or constructively known to A.S.T Supervisors and policy makers prior to the Keehn search warrant - including by means of their direct participation in the reprimand and internal investigation of Ingram in 2009 for his involvement and manipulation/planting of evidence in the search of Beauford Harman residence in Wsilla.

Failure to discharge Ingram for this infraction is a direct cover up or participation in the deprivation of Plaintiffs Constitutional Rights

- 4) Prior to and at the time of the unlawful search warrant of the Keehns, by and through final policy makers they failed to adequately train and supervise their officers regarding fundamental, basic investigative tasks implicating the Federal Constitutional Rights of witnesses and suspects including but not limited to manipulating and or planting and or removing and or destroying evidence and not documenting and disclosing exculpatory evidence.
- 5) Each defendant failed to intervene and prevent the other defendants from violating Plaintiffs constitutional rights. Each defendant failed to acknowledge and reprimand or discharge Ingram after being notified by Plaintiffs that the violation of their rights had occurred,

with the reasons stated above Defendants individually and in concert Officially, deprived Plaintiffs of property, liberty, privacy, sense of security and individual dignity.  
losses accrued because of invalid search warrant including property, loss wages, emotional distress and possessions stolen.

Claim 5: on or about 20 day of January 2016 my civil right to due process as stated in the First and Sixth amendment was violated by Assistant District Attorney Alex Alexander

Supporting Facts.

On or about 20th of January 2016 The defendant went outside of his official Judicial courtroom duties and his Official Capacity as an ASST. STATE Prosecutor to relay false information to the Frontiersman Newspaper in wasilla.

The Defendant in his attempt to taint the Fair Jury pool gauranteed by the Constitution with Slander and Untrue statements made to him by Investigator Ingram.

The article reads "Plaintiff showed up at fatal scene of Car wreck to and stated he was Sara Johnstons father, Keehn identified Saras remains and lied to officer about his relation to Sara.

Defendant also said I had prior convictions of Aggravated Sexual ABuse to a minor, Knowing this to be untrue,

Reporting false information to newspapers is outside of his job duties as a prosecutor and should not be granted absolute immunity.



**D. Previous Lawsuits**

1. Have you begun other lawsuits in **state or federal court** dealing with the **same facts** involved in this action, **or otherwise relating to your imprisonment?** \_\_\_\_\_ Yes ☒ No

2. If your answer is "Yes," describe each lawsuit.

a. Lawsuit 1:

Plaintiff(s): none

Defendant(s): \_\_\_\_\_

Name and location of court: \_\_\_\_\_

Docket number: \_\_\_\_\_ Name of judge: \_\_\_\_\_

Approximate date case was filed: \_\_\_\_\_ Date of final decision: \_\_\_\_\_

Disposition: \_\_\_\_\_ Dismissed \_\_\_\_\_ Appealed \_\_\_\_\_ Still pending

Issues Raised: \_\_\_\_\_

b. Lawsuit 2:

Plaintiff(s): \_\_\_\_\_

Defendant(s): \_\_\_\_\_

Name and location of court: \_\_\_\_\_

Docket number: \_\_\_\_\_ Name of judge: \_\_\_\_\_

Approximate date case was filed: \_\_\_\_\_ Date of final decision: \_\_\_\_\_

Disposition: \_\_\_\_\_ Dismissed \_\_\_\_\_ Appealed \_\_\_\_\_ Still pending

Issues Raised: \_\_\_\_\_

3. Have you filed an action in federal court that was dismissed because it was determined to be frivolous, malicious, or failed to state a claim upon which relief could be granted?

\_\_\_\_\_ Yes ☒ No

If your answer is "Yes," describe each lawsuit on the next page.

**F. Request for Relief**


Plaintiff requests that this Court grant the following relief:

1. Damages in the amount of \$ 2 million
2. Punitive damages in the amount of \$ 200,000
3. An order requiring defendant(s) to discharge Troopers after first time
4. A declaration that they are caught manipulating evidence or planting evidence.
5. Other: \_\_\_\_\_

Plaintiff demands a trial by jury. \_\_\_\_\_ Yes X No

**DECLARATION UNDER PENALTY OF PERJURY**

The undersigned declares under penalty of perjury that s/he is the plaintiff in the above action, that s/he has read the above civil rights complaint and that the information contained in the complaint is true and correct.

Executed at Anchorage Correctional Complex on 10 August 2017  
(Location) (Date)  
  
(Plaintiff's Signature)

\_\_\_\_\_  
Original Signature of Attorney (if any)

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
Attorney's Address and Telephone Number

TERRY KEENE - 715925  
Anchorage Correctional Complex-East  
1400 East 4th Ave  
Anchorage AK 99501

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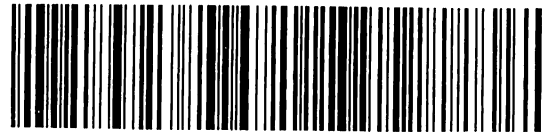
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